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November 17, 2003

Director Ron Jones Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

RE: Time Warner Telecom – MidSouth's ("TWTC") Comments; Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of T.C.A. §65-21-114 03-0050

Dear Director Jones:

On behalf of Time Warner Telecom of the Midsouth, L.P. ("Time Warner"), we are submitting brief comments in the referenced docket pursuant to Notice dated November 12, 2003. Time Warner appreciates the opportunity to file comments and thanks you and the TRA staff for the opportunity to participate in the Workshop.

Time Warner encourages the TRA to search for more creative solutions in resolving the problems of preventing statutory violations in the implementation of county wide calling. Time Warner respectfully submits that the TAR database is not the only solution and that other solutions such as adoption of GEOCodes and the regulation of retail/wholesale prices so as not to encourage arbitrage are but two potential solutions. Regardless of the scheme or methodology which is finally adopted by the TRA, the burden to implement the process should not be more onerous to one group of companies as compared to another group of companies in the industry.

Page 2 Jones Letter November 17, 2003

Thank you for your time and consideration in this matter.

Very truly yours,

FARRIS MATHEWS BRANAN BQBANGO & HELLEN, PLC

Charles B. Welch, Jr.

CBW/cad

Enclosure